NAVFAC Contractor Safety

A Command Wide Program

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NAVFAC
Naval Facilities Engineering Command

Naval Facilities Engineering Command

Essentials in Contractor Safety

O

AVFAC/Contractor team

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NAVAFC Midlant
Construction Safety Program Manager

NAVFAC VALUES PERSPECTIVE

- **NAVFAC is a world class organization that holds its safety culture at its core of values.**
- **Our accepted command goal of ZERO Mishaps is engrained in our community.**
- **Safety of the entire team (including contractors) is a priority and an added benefit to the readiness of the Navy and Marine Corps war fighter commands**

NAVFAC

ZEROING IN ON INJURIES

OWNERSHIP

Everyone owns injury prevention.

Everyone is accountable, empowered & personally involved

Leadership must take personal action, establish goals, identify core values, allocate resources & demonstrate personal commitment

ORGANIZATION

Organizational structure supports success.

Establish executive level position & council

Define roles & responsibilities

Establish authority

Form action committees

Staff safety and health

Tailor safety and health programs

Develop return-to-duty program

Manage & review acquisition

Ensure contractor safety (per FAR)

Train 100%

Establish policies, guidance & plans

Provide resources

Hold subordinates accountable

Establish clearinghouse

Set targets

Establish visibility & oversight

Communicate leadership's key messages & core values

Identify heroes

Recognize success

Communicate issues, activities & plans

CULTURE

Define metrics

Establish uniform performance measurement systems

Promote program & results

Link safety, health & personnel

Tailor information flow

Distribute information

Manage information

COMMUNICATIONS

Communication drives change.

Develop communications campaign

Identify key messages

Target all levels

Identify appropriate media

Use communication channels

Provide resources

INFORMATION SYSTEMS

We can only manage what we measure.

Ensure the system is real time, integrated, accessible & resourced

NAVFAC Commitment (Guiding Principles)

NAVFAC
Naval Facilities Engineering Command
NAVFAC ATLANTIC

SAFETY CULTURE – COMMANDER'S TOP TEN GUIDING PRINCIPLES

1. **Safety is an ethical and moral responsibility of the Command and each employee.** It is our responsibility to do what's necessary to protect employees from death, injury, and illness in the workplace. Everyone is responsible for safety … it is about culture, it is about ownership, it is about accountability.
2. **All injuries are preventable.** Accepting mishaps as "just accidents" with no ability to prevent is not acceptable. The fundamental belief that injuries are, by their nature, preventable is a catalyst that encourages us to prevent injuries.
3. **Safety is a cultural mindset and a prerequisite in everything we do.** The combined commitment and participation of the entire organization is necessary to create and maintain an effective safety culture. Safety is 24/7 planned before each task on and off duty with employees looking out for each other.
4. **Everyone is responsible.** Management's responsibility is to lead the safety effort in a sustained and consistent way, establishing safety goals, demanding accountability for safety performance, and providing the resources necessary for a safe workplace. Everyone is responsible for safety. The role of the safety staff is to coordinate policies and processes, provide program oversight, and act as advisors.
5. **Everyone must be trained to work safely.** Awareness of safety does not come naturally - we all need to be trained to work safely. Effective job-specific training with associated hazard awareness and mitigation is essential for employees to be a productive part of the safety culture.
6. **Safety is a condition of employment.** The command will exhaust every reasonable means to lead, motivate, and train employees to maintain a safe workplace. In the event an employee refuses to take actions required to work safely, the command will utilize a system of progressive discipline.
7. **Provide encouragement and recognition for safe performance.** It is important to be as equally involved noting safe work practices as it is identifying deficient performance. Supervisors should give positive encouragement to employees observed working safely. Supervisors should solicit and encourage employee creative solutions for ways to improve workplace safety.
8. **Safety programs must be site specific with recurring internal and external audits of the workplace and prompt corrective action.** Our goal is to discover and remedy actual hazards before they can injure workers. Recurring hazard analyses, comprehensive inspections, and aggressive investigation of accidents or near misses help discover potential workplace hazards - all keys to success.
9. **Safety is good stewardship of federal funds.** Managers and employees must understand that being proactive in safety creates a competitive advantage. Reducing workplace injuries and illnesses not only results in less pain and suffering for our employees and their families but also reduces the costs of workers' compensation, medical expenses, and corresponding loss in productivity. Effective workplace safety is not an expense, it's an asset.
10. **Facilitate employee ownership of safety.** Employees should be solicited for their ideas to improve safety. Employee based safety committees is an effective avenue for facilitating a direct line of communication between workers and managers.

R.E. CELLON
RDML, CEC, USN

Compliance with this Commitment and applicable laws is the responsibility of every employee and contractors acting on our behalf and a condition of their employment or contract.

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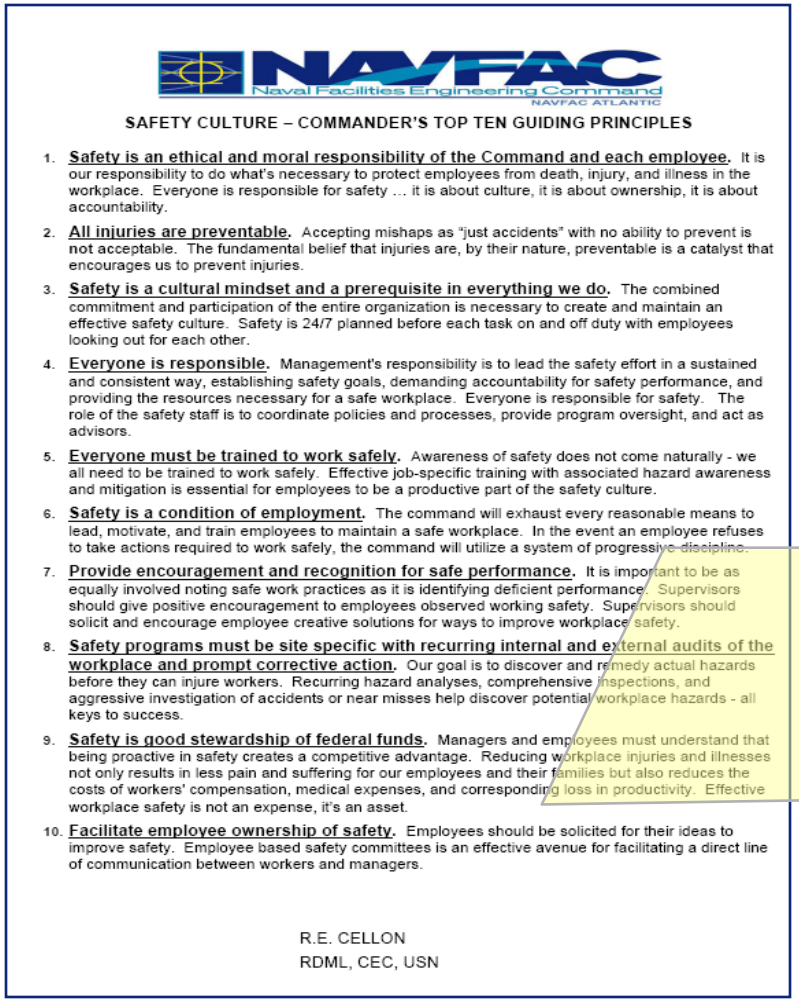
NAVFAC believes that all injuries can and should be prevented. This applies to all personnel on work sites, not just our employees. It's key that we influence this basic premise in the NAVFAC philosophy to all personnel.

NAVAC Commitment (Guiding Principles)



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Injuries to contractor employees have involved costly litigation and in some cases completion delays. The best way to reduce these costs was to help the contractor reduce the number and severity of accidents. Experience shows that the improved contractor safety performance will result in improved overall effectiveness.

KEYS TO SUCCESS WITH OUR CONTRACTORS

- **STRONG LEADERSHIP FOCUS**
  - **Goal of 0 safety mishaps!!**
  - **Command leadership at all levels considers contractor employees part of our total force team and our ten guiding safety principles apply to them as well.**
  - **Each mishap (including near miss) is reviewed during a comprehensive mishap review board (MRB) meeting conducted at least monthly specifically addressing accountability.**
  - **Mishap notifications include full chain of command.**
  - **Corporate Voluntary Protection Program (VPP) has been initiated (includes contractors).**

KEYS TO SUCCESS WITH OUR CONTRACTORS

- **STRONG FIELD SAFETY KNOWLEDGE**
  - **Engineering Technicians and Construction Managers are fully qualified in in our admin processes and use them as a tool to manage the contracts.**
    - EM-385 two-part review and exam (all construction ETs and engineers)
    - 40 hour construction safety class (all)
    - USA Corps of Engineering Technical classes (ex: welding; earthwork; dredging)
    - Weekly in-house ET training
    - Specific classes-such as the 40-hour Hazardous Waste course and 8 hr yearly refreshers.
    - OSHA 100hr course- given by ABC (Assoc Builders and Contractors trade group)- new initiative. 8-10 personnel from the area each qtr in attendance.
  - **NAVFAC Construction Managers and QA Personnel are empowered to stop any unsafe condition - particularly those involving imminent danger.**
  - **Field personnel are experts in construction and contract management.**
    - QA Personnel come from construction trade background (electricians, masons, etc)
  - **Robust Team (CM, ET and AQ) works contract from Award to Occupancy**

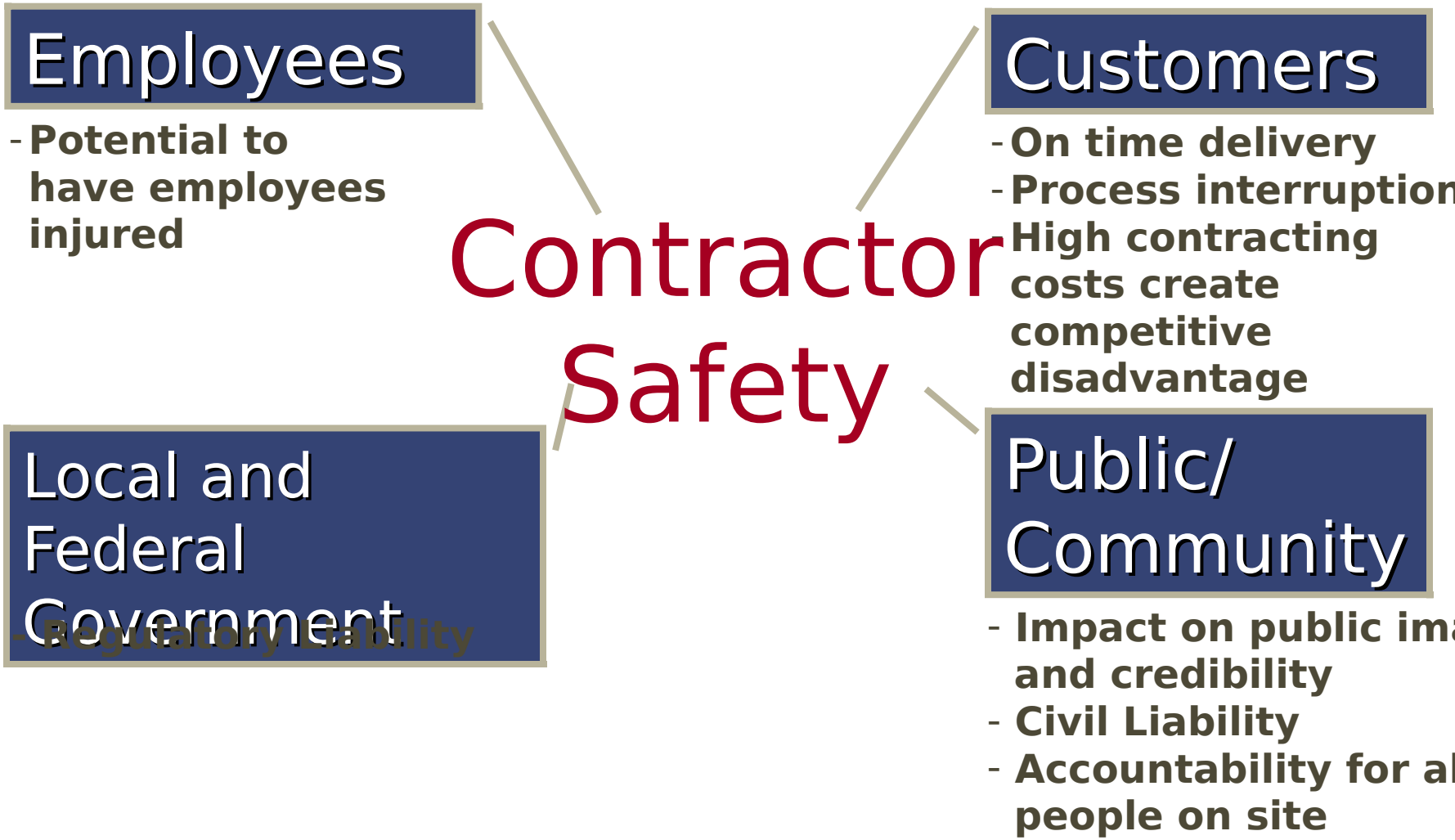
KEYS TO SUCCESS WITH OUR CONTRACTORS

- **SUPPORTIVE ADMIN PROCESSES**
  - **Safety is considered throughout contract process from Specification development through Final evaluation.**
  - **A web based mishap reporting system is maintained for all NAVFAC contracts allowing for metrics and trend analysis with the ability to identify unsafe performing contractors for proactive preventative action.**
  - **Best practices are deployed corporately using a web based Business Management System (BMS) for process consistency.**

The opportunities……..

- **Protect lives, quality of life**
- **Lower project costs**
- **Lower contracting costs**
- **Faster project completion**
- **On-time project delivery**
- **Competitive advantage**
- **Mishap cost avoidance**

The Impact On Stakeholders



NAVFAC Contractor Safety Management Process

Contractor Selection

Contract Preparation

Contract Award

Orientation and Training

Managing the Work

Post-Contract Evaluation

Contractor Selection

Contract Preparation

Contract Award

Orientation and Training

Managing the Work

Post-Contract Evaluation

Step 1

Participants:

- Acquisition, Project Managers, Safety professionals.
- Source Selection Board (95% of all contracts)
- Contractors
- Insurance companies
- OSHA

Key Elements:

- Fair Database evaluation
- Evaluation of key OSHA and industry safety metrics.
- Identify contractors who are compatible with client's operating safety principles.
- Critically evaluate performance criteria: EMR's, injury rates, programs, competency.
- Evaluate OSHA citation history.
- Include safety recognition awards received.
- Integrate new systems into sourcing process.
- Encourage VPP participation

Desired Outcome

- Qualified bidders list, pre-screened for safety capability
- Proper start-up of the contracting process
- ~~Strong safety influences quality (relationship)~~

The Source Selection Process

- **Gone are the days of IFBs**
- **Current Tools**
  - **Multiple Award Award Construction Contracts (MACCs) 53%**
  - **Simplified Acquisition Procurement (SAP)/BPAs 42%**
  - **Invitation for Bid (IFB) 3%**
  - **Remedial Action Contracts (RAC) 2%**

The Source Selection Process

- **Best Value Source Selection**

  (Factors other than Price are Considered)

  - **Corporate Experience**
  - **Past Performance**
  - **Key Personnel**
  - **Management Approach and Schedule**
  - **Safety**
    - ***EMR***
    - ***OSHA LWDR***
    - ***OSHA RIR***
    - ***OSHA Citations***
  - **Small Business**

The Source Selection Process Safety Sub-factors (Factor A, EMR)

- Experience Modification Rate (EMR)
- New Company EMR = 1.0. Can go up or down with time.
- EMR < 1.0 is good, EMR > 1.0 is not good
- Offerors submit insurance company certificate for past 5 years and a Carrier POC for verification.
- Standard:
  - Excellent Less than 0.7
  - Good From 0.7 to less than 0.8
  - Satisfactory From 0.8 to less than 0.9
  - Marginal From 0.9 to 1.0
  - Poor Greater than 1.0

The Source Selection Process Safety Sub-factors (Factor B, LWDR)

- Occupational Safety & Health Act (OSHA) Lost Work Day Rate (LWDR)

- LWDR = (200,000 x A)/B (industry standard calculation)

  Where A = # of lost workday cases & B = total # hours worked

- Offerors provide 5-year history. May obtain from insurance Carrier.

- Standard:
  - Excellent Less than 1
  - Good From 1 to less than 2
  - Satisfactory From 2 to less than 3
  - Marginal From 3 to 4
  - Poor Greater than 4

The Source Selection Process Safety Sub-factors (Factor C, RIR)

- Occupational Safety & Health Act (OSHA) Recordable Incident Rate (RIR)

- RIR = (200,000 x C)/B (industry standard calculation)

  Where C = # of recordable incidents & B = total # hours worked

- Offerors provide 5-year history. May obtain from insurance Carrier.

- Standard:
  - Excellent Less than 3
  - Good From 3 to less than 5
  - Satisfactory From 5 to less than 7
  - Marginal From 7 to 9
  - Poor Greater than 9

The Source Selection Process Safety Sub-factors (Factor D, Citations)

- All Federal, State and Municipal Occupational Safety & Health Act (OSHA) Citations are considered
- Offerors provide 5-year history and must indicate whether citations are serious, resulted in fines, and/or are repetitive.
- Verified at: http://www.osha.gov/cgi-bin/est/est1
- Standard: somewhat subjective.
- The standard has been met when the offeror demonstrates minimal citations.
- Violations that are serious shall be treated with greater weight.

Summary

- **Upcoming Workload and Impact of Safety Performance on the Source Selection Process**
- **Lots of work coming over the next several years and we can’t get it done without contractors support**
- **The days of awarding work based on lowest price alone are over**
- **Those with good safety records stand a better chance of getting the work.**

Contractor Selection

Contract Preparation

Contract Award

Orientation and Training

Managing the Work

Post-Contract Evaluation

Step 2

Participants

- Designers, Attorneys, Contract Specialists, Safety Professionals
- Contractor (Design Build)

Key Elements

- Develop contract package that uses specific customized language in the boiler plate documentation to clarify safety expectations for that particular contracting need.
- Help contractors understand how to enforce their contract safety requirements
- USACE EM 385-1-1 Current Edition
- UFGS Safety Specification 013529
  - Specific elements

Desired Outcome

- Bid documents and RFP's that effectively communicate safety expectations

SAFETY IN NAVFAC'S CONTRACTS

1) Safety contract provisions – Guide specification and EM 385-1-1 outlining specific hazards and procedures to control hazards with minimum qualifications for site management.

2) Source selection - pre-award
   - Experience modification rates (EMR) (Must be <1.0; excellent <.7
   - OSHA lost work day rates (Excellent <1.0 bad is >4)
   - Recordable incident rate for the last 5 years. (Best<3; poor >9)
   - # of OSHA citations for the last 5 years.
   - Also consider safety awards

3) Site specific safety plan- Submitted by the contractor after award and reviewed by qualified personnel. Required before any work may begin.

SAFETY IN NAVFAC'S CONTRACTS

4) Activity Hazard Analysis (ORM) submitted by the contractor for each phase of the work and reviewed with all employees.

5) Pre work conference - Before work begins conducted by NAVFAC with contractor – includes review of safety plan and special hazards. Fire Department, Station Safety Office, and Security invited.

6) Monthly assessment process coordinated with voucher processing. Deficiencies result in payment retainage.

7) End of contract performance evaluation – includes safety performance.

TAKE AWAYS

- **NAVFAC is fully committed to Safety of Government and contractor personnel, equipment and facilities**
- **Chain of command is deeply involved.**
- **We have a robust approach to Contractor Safety**
- **We appreciate your role in overall base safety**

Contractor Selection

Contract Preparation

Contract Award

Orientation and Training

Managing the Work

Post-Contract Evaluation

Step 3

Participants

- Contract specialists, safety professionals, project managers

Key Elements

- Prepare to conduct a thorough and effective review of contract safety specifications at bid meetings & pre-award meetings
- Develop key personnel to work effectively
- Assure assignment of qualified NAVFAC employee to each contract for safety oversight meeting established minimum training requirements
- 40 Hour Construction Safety Hazard Awareness Course (+) Army Corps of Engineers two part certification exam (+) OSHA 30 Hour Certification
- (+) 100 Hour Construction Site Safety Technician Course
- Web based EM 385 training for contractors (NEW!)

Desired Outcome

- Clear, common understanding of safety expectations by all parties

Contractor Oversight
FEAD/ROICC Office: Roles & Responsibilities

Before Fieldwork Begins

- Review and Accept/DISAPPROVE Accident Prevention Plans
- Review and Accept Activity Hazardous Analysis for each Preparatory and Initial Phase meeting
- Assure "Special Permission Energized Electrical Work Permit" submitted and approved
- Review/accept all Lead Plans, Asbestos Plans, Demo Plans, PCB plans, and Environmental Plans.
- Review/accept all Crane Plans (except NNSY) until implementation of NAVFACMIDLANTINST 11262.1 is approved.
- Receive/accept Certificate of Compliance for all cranes
- Review/accept all critical lift plans (assistance from NNC as needed)

Safety QA

- During each site visit
- Review contractor weekly safety meetings and assure documentation is current
- Review contractor supervisors monthly safety meeting documentation.
- Ensure CSIR is completed and turned into the ROICC office after accidents
- Send notification to NAVFAC MIDLANT of accident
- Collect Quarterly man-hours for entry into FAIR program
- Enter Quarterly man-hours into FAIR program by contract number, incident rate and man-hours
- Require, review material and attend safety stand-down after any accident

Contractor Oversight
FEAD/ROICC Office: Roles & Responsibilities

Fieldwork Oversight Task

- Safety Inspections to be conducted
  - Every job site at least once a month
  - Quarterly safety contractor awards verification by Construction Manager and ET
  - Every time ET or Construction Manager go to jobsite
  - After any accident or near miss

Crane Oversight Tasks

- Complete 30 point QA spot-check when crane arrives on jobsite.
- Assure Crane and Derrick Inspection Requirements as required by Appendix H EM-385-1-1 are completed.
- To include: Startup Inspections, Periodic Inspections, and Frequent Inspections (as needed)
- Assure Crane Performance tests (operational and load) have been completed operational-every time a crane is brought onto a project and every year and performance- every time crane is reassembled or reconfigured.
- Safety QA for Floating cranes, Land Cranes or Derricks mounted on barges or pontoons meet the requirements of EM-385 Sec 16.F.
- Investigate all crane accidents and assist in determining causes which lead to accident.
- Assure Safety Stand downs are held and no work is done until problems corrected.

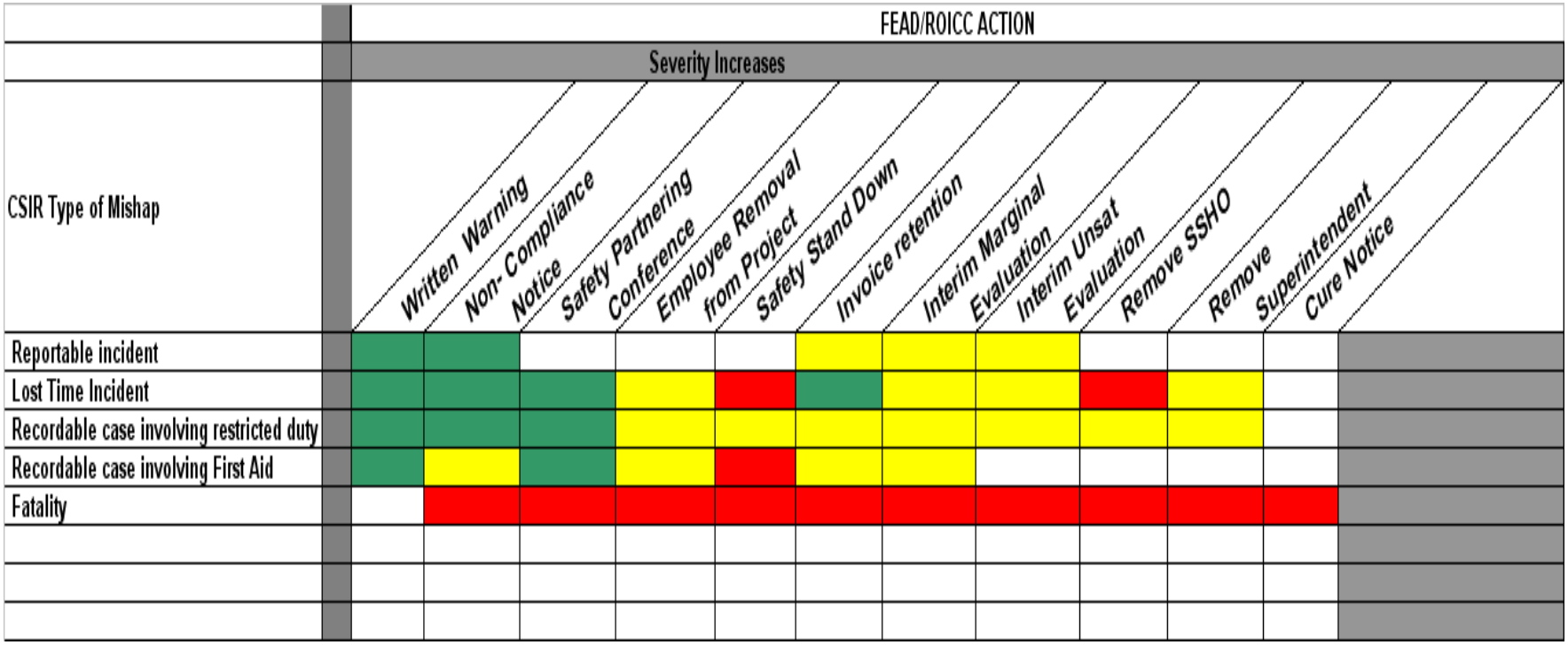
Contractor Oversight
FEAD/ROICC Office: Roles & Responsibilities

Mishap Investigation

- Investigate Mishaps and assist in determining causes which lead to accident
- Prepare Heads-Up, Conduct Mishap Investigations, and enter CSIR Data into FAIR
- Conduct Site Safety Inspections: Crane Startup Inspections, Periodic Inspections, and Frequent Inspections (as needed)
- Enter Quarterly Man-Hour Data into FAIR. * Construction reporting now and developing system for Service Contract man-hour entry
- Engage Contractors Management in Safety issues early (See Ops Letter)
- Use Safety Action Matrix to ensure consistent response to contractor mishaps (next slide)

SAFETY ACTION MATRIX

Range of actions depend on Type of Mishap and current contractual performance.



As safety performance decreases and mishaps increase the FEAD/ROICC actions severity i

1. Green – Contract performance is currently Outstanding/Highly Satisfactory with no tre

2. Yellow – Contract performance is currently Satisfactory with repeated incidents occurri

3. RED - Contract performance is Marginal/Unsatisfactory. Previous actions were taker attention is required.

THE FEAD/ROICC, under extraordinary circumstances, may take more severe action if war

Step 4

Contractor Selection

Contract Preparation

Contract Award

Orientation and Training

Managing the Work

Post-Contract Evaluation

Participants

- Project manager, safety professional, contract administrators.

Key Elements

- Assure that all work done in prior 3 steps culminates effectively at this point.
- Assure contract workers embrace the “safety culture” of site/project specific safety requirements in the contractor initial orientation and training
- Assure that the right people from the asset owner and contractor participate in pre-work meetings (Pre-con).
- Include safety in each of the three phases of contractor quality control (Preparatory, Initial, and Follow up)
- Assure contractor delivers with site managers that have minimum level of safety qualifications.
  (30 Hour OSHA minimum)
- Site Specific Accident Prevention Plan (APP)

Desired Outcome

- Knowledge, understanding, and commitment to safety requirements by contract workers
- Expect some worker self elimination
- Accountability on site

Step 5

Contractor Selection

Contract Preparation

Contract Award

Orientation and Training

Managing the Work

Post-Contract Evaluation

Participants

All levels of owner and contractor personnel

Key Elements

- Assure that audits are directed at injury prevention rather than “policing”
- Monthly Self assessments incorporated as part of payment process with scoring mechanism driving continuous improvement and avoids repetition of common errors
- Contractor safety deficiency tracking system with corrective actions
- Pre task safety planning and controls - Activity Hazard Analysis process
- Share lessons learned from mishaps
- Evaluate safety in the facility design as work progresses
- Engage company principles if mishaps occur.
- Each mishap (including near miss) is reviewed during a comprehensive mishap review board (MRB) meeting conducted at least monthly specifically addressing accountability (accountability matrix).
- Mishap notifications include the full chain of command.

Desired Outcome

- Reduction of unsafe acts and conditions
- ZERO Lost time injuries
- Working effectively together

Step 6

Participants

- Owner and contractor management

Key Elements

- Establish a process that eliminates poor performers and rewards contributors
- Use NAVFAC “STAR” program for incentive of safety through awards & recognition
- Enable different commands / sites / contractors to share successes
- Use contract evaluation process (Interim & Final)
- Use web based FAIR database to evaluate contractor mishaps and benchmark to assist contractors in continuous improvement

Desired Outcome

- Contractor improves future performance
- NAVFAC improves contracting process
- No negative impact on war fighter readiness

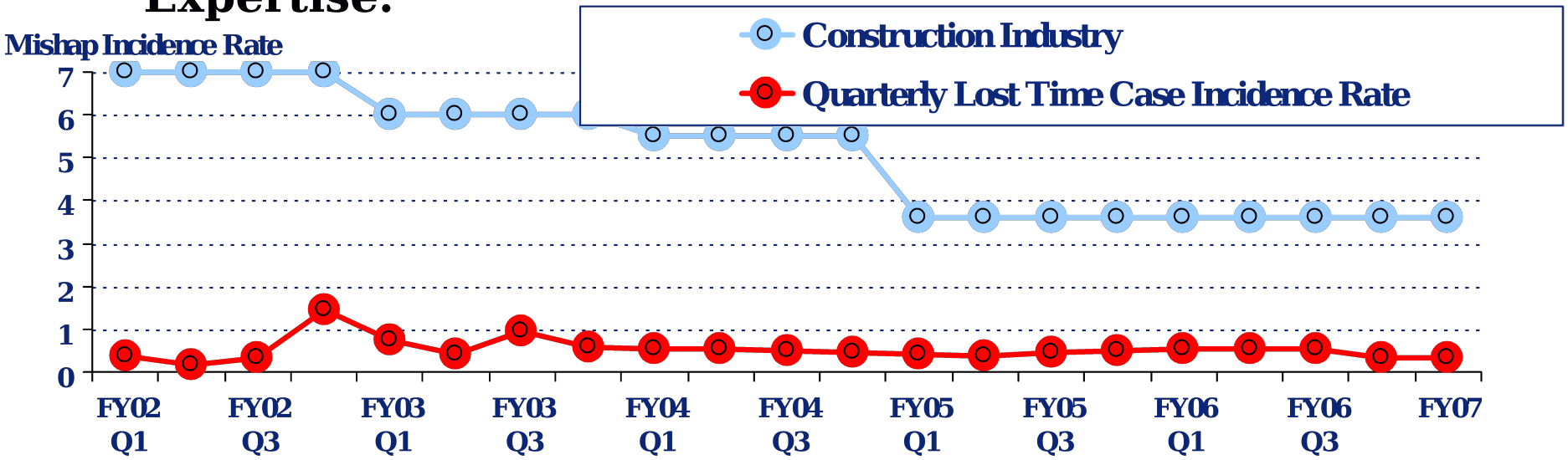
Challenges……

- **Escalating insurance costs**
- **Increased costs, lower margins**
- **Temptation to cut programs & staff**
- **Less competitive**
- **Decreased revenue**

Contractor partnership results

- **Assessment**

  High Quality Contractor Safety Programs assisted by NAVFAC contract oversight personnel with Safety Expertise.



Gen. Construction Industry Rate 3.9 for 2007

NAVFAC FAIR Rate for 2007

NAVFAC
Naval Facilities Engineering Command

OSHA FOCUSED INSPECTIONS

PRIMARY GOALS

- **Enhance safety on construction sites by motivating controlling employers to implement effective safety and health programs**

- **Focus on the four hazards which cause 90% of the serious injuries and fatalities on construction sites**

FOUR LEADING HAZARDS

- **Falls from Elevation**
- **Struck By (falling objects, vehicles)**
- **Caught In/Between (cave-ins, unguarded machinery/equipment)**
- **Electrical (power tools and cords, temporary wiring, electrical service)**

QUALIFY FOR FOCUSED INSPECTION

- **Jobsite safety and health program must meet the requirements of 29 CFR 1926**

- **Must have a designated person responsible for and capable of implementing the safety program**

FACTORS FOR AN EFFECTIVE SAFETY PROGRAM

- **Comprehensiveness of the program**
- **Involving sub-contractors**
- **Degree program is implemented**
- **Presence of required competent persons**
- **Means by which the program is enforced**

BENEFITS OF A FOCUSED INSPECTION

- **Inspection is limited to the four hazards**
- **Other-Than- Serious hazards abated during the inspection are not cited**

MULTI-EMPLOYER CITATION POLICY

- More than one employer may be cited for a hazardous condition that violates an OSHA standard

TYPES OF EMPLOYERS

- **Creating Employer**
- **Exposing Employer**
- **Correcting Employer**
- **Controlling Employer**

CREATING EMPLOYER

- **Employer that caused a hazardous condition that violates an OSHA standard**

- **Example: Contractor that is responsible for installing guardrails but fails to do so**

EXPOSING EMPLOYER

- **Employer whose own employees are exposed to the hazard**

CORRECTING EMPLOYER

- **Employer who has the responsibility of installing and or maintaining particular safety and health equipment or devices**

- **Example: Electrical contractor that has responsibility for maintaining temporary electrical service**

CONTROLLING EMPLOYER

- **Employer who has general supervisory authority over the worksite, including the power to correct safety and health violation itself or require others to correct them**

- **Example: Prime/General Contractor**

NAVFAC Contractor Mishap Investigation & Reporting

NAVFAC SAFETY

MISHAP REPORTING REQUIREMENTS

- Site Safety Rep Shall be Notified as soon as a Mishap is Reported
- A Heads Up Required for All Contractor Mishaps within 4 hours
- PWO/ROICC shall report the status of the mishap by the COB the next day
- CSIR Must be Submitted Within 5 Days of the Mishap
- CSIRs Shall Be Briefed to a Review Board

NAVFAC SAFETY

Contractor Significant Incident Report (CSIR)

REPORTING REQUIREMENTS

A CSIR is Mandatory for:

- **All Mishaps that result in medical treatment including: lost time, restricted work, transfer of job, loss of consciousness.**
- **Any Property Damage Equal to or Greater $2,000.00**
- **All Crane Mishaps**
- **Near Misses - An incident that could have resulted in an injury or significant damage.**
- **Lessons Learned- Incidents with special emphasis on confined space, Fall Protection Electrical Hazards, Fires, Excavations, Cranes, Diving, Ordnance, and any Equipment Related Mishap.**
- **Review BMS for requirements**

NAVFAC SAFETY FEAD/ROICC TRAINING REQUIREMENTS

CONTRACT/CONSTRUCTION SAFETY OVERSIGHT/ QA –
For all personnel who conduct safety oversight on contract jobs that require the EM-385-1-1 requirements; duties would include inspections to ensure specification compliance.

Requirements

2. NAVFAC Construction Hazard Awareness Training Course (5 days) (329)
   Requirements/Regulator Driver: NAVFAC P 445
   Hours:40 = 40 CLP'S Length: 5 Days

3. NAVFAC Construction Safety and Health Correspondence Course Part 1 (1298)
   Requirements/Regulator Driver:1. **NAVFAC P 445**
   Hours:16 = 16 CLP's Length: 2 Days

4. NAVFAC Construction Safety and Health Correspondence Course Part 2 (1299)
   Requirements/Regulator Driver: NAVFAC P 445
   Hours: 4 = 4 CLP's Length 1 Day

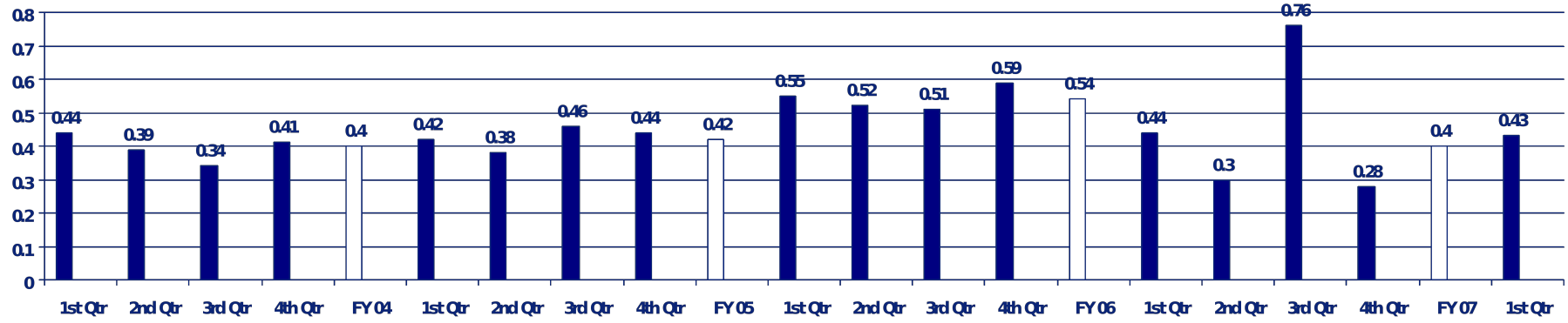
1. Construction Safety QA/Construction Safety - There is No Substitute (1297)
   Requirements/Regulator Driver: P-445
   Hours: 4 = 4 CLP's **Length: 1 Day**

5. PPE Job Specific Usage - Conducted by your supervisor (OJT by Supervisor)

Safety Execution

Construction Contractor - Days Away, Restricted Duty, or Transfer (DART) Rate

BLS Construction Industry non government sector FY 05 = 3.9; FY 06 = 3.2



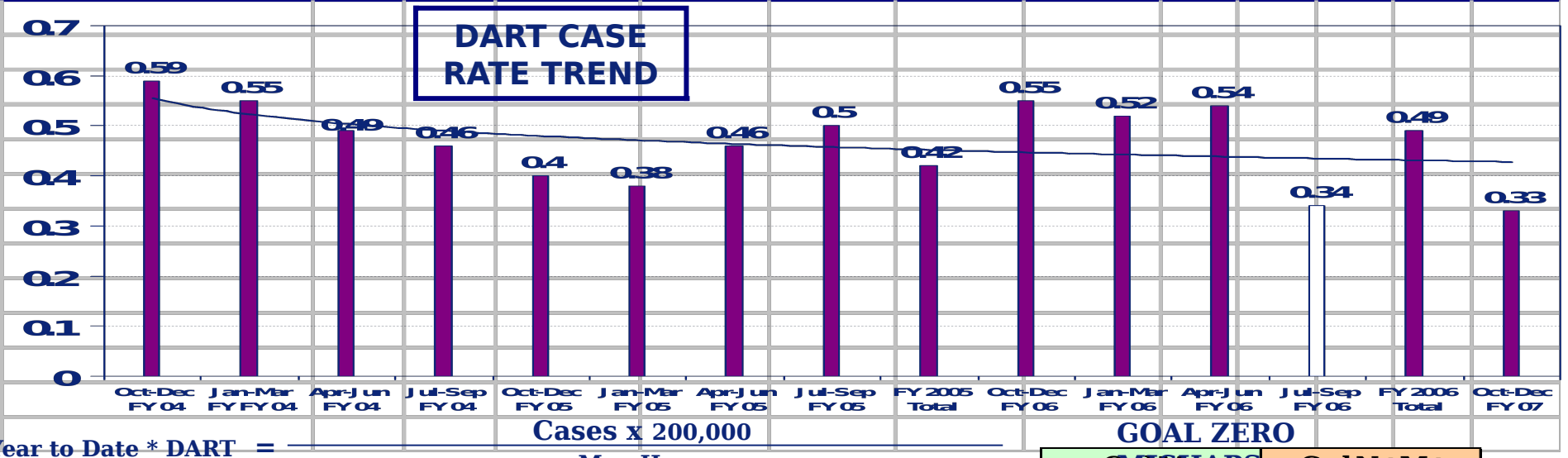
FY -04 | FY -05 | FY -06 | FY -07 | FY -08

Activity	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total Cases FY 2008 YTD	DART Rate FY 2008	DART Rate FY 2007	DART Rate FY 2006
Washington	0	0	1	0	0	0	0	0	0	0	0	0	1	0.48	0.97	1.19
Mid-Atlantic	0	3	2	0	0	0	0	0	0	0	0	0	6	0.61	0.41	0.65
Southeast	0	0	1	0	0	0	0	0	0	0	0	0	1	0.21	0.24	0.14
Midwest	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.00
Northwest	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.40	0.47
Southwest	0	1	2	0	0	0	0	0	0	0	0	0	3	0.64	0.39	0.24
Europe and SW Asia	0	1	0	0	0	0	0	0	0	0	0	0	1	0.42	0.15	0.27
NAVFAC Atlantic Totals	0	5	6	0	0	0	0	0	0	0	0	0	11	0.43	0.40	0.54

Fatality | Goal Met | Goal Not Met

Mishap Reduction Metric

Component Command	Rate FY 06 Rate	Rate FY07	Contractor Man-Hours FY 2007 Oct -Dec 2007 man-hours	Jan-Mar 2008 man-hours	Apr-Jun 2008 man-hours	Jul-Sep 2008 man-hours	FY 08 YTD man- hours	DART Cases Oct - Dec 2007	Jan-Mar 2008	Apr-Jun 2008	Jul-Sep 2008	Rate FY 08 Rate
NAVFAC Washington	1.14	0.89	643,258					1				0.29
NAVFAC Midlant	0.65	0.41	1,645,366					5				0.61
NAVFAC Southwest	0.40	0.38	966,422					4				0.83
NAVFAC Southeast	0.42	0.23	1.519.955					3				0.39
NAVFAC Northwest	0.46	0.79	139,839					0				0.00
NAVFAC Midwest	0.00	0.00	230,278					0				0.00
NAVFAC EUR/SWA	0.39	0.15	472,283					1				0.42
NAVFAC Atlantic	0.54	0.36	5,448,566					14				0.33



Year to Date * DART = Cases x 200,000 / Man Hours

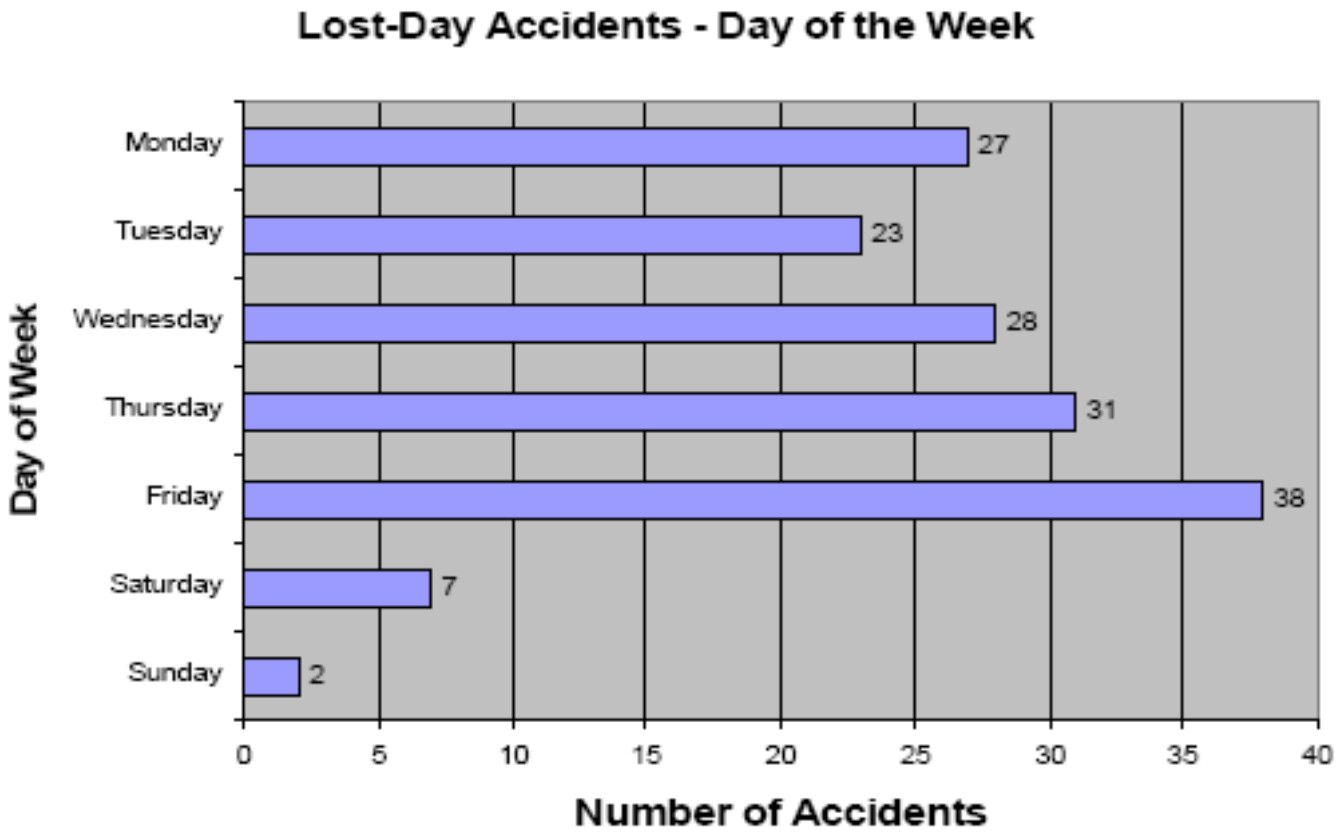
GOAL ZERO MISHAPS

Goal Met | Goal Not Met

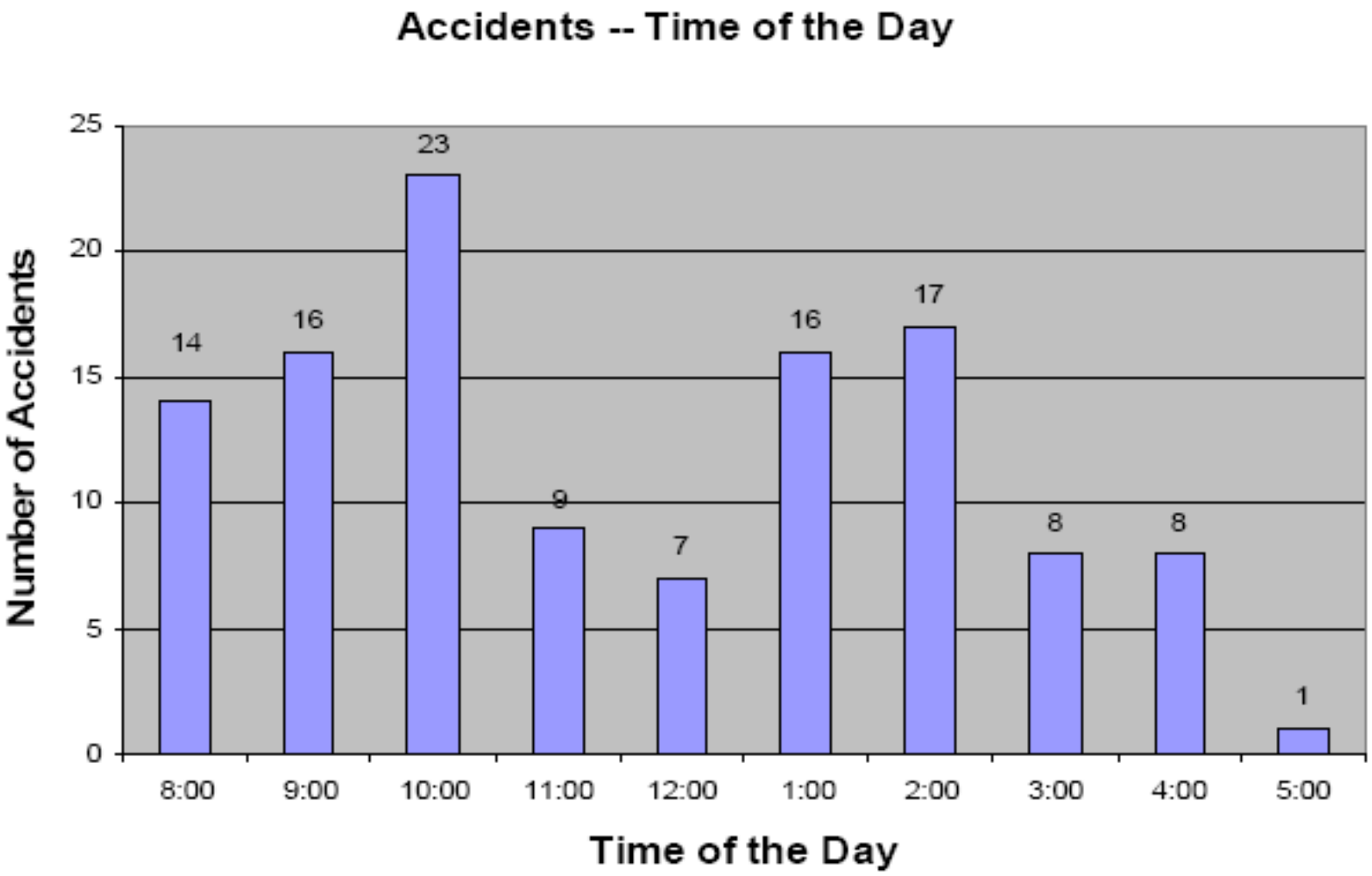
* Defined by Department of Labor as Days Away, Restricted, or Transferred Rate

Reported Quarterly: J, A, J,

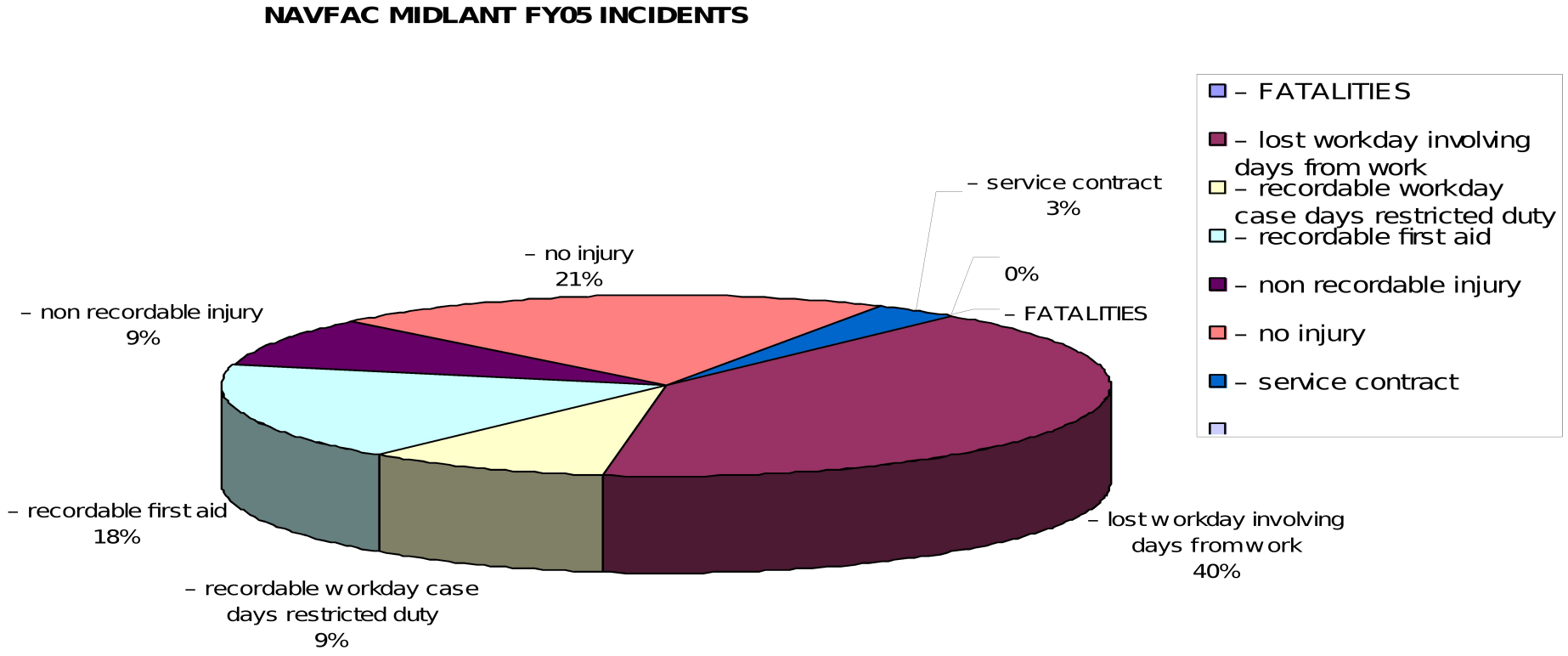
ACCIDENTS – DAYS OF THE WEEK



ACCIDENTS – TIME OF THE DAY

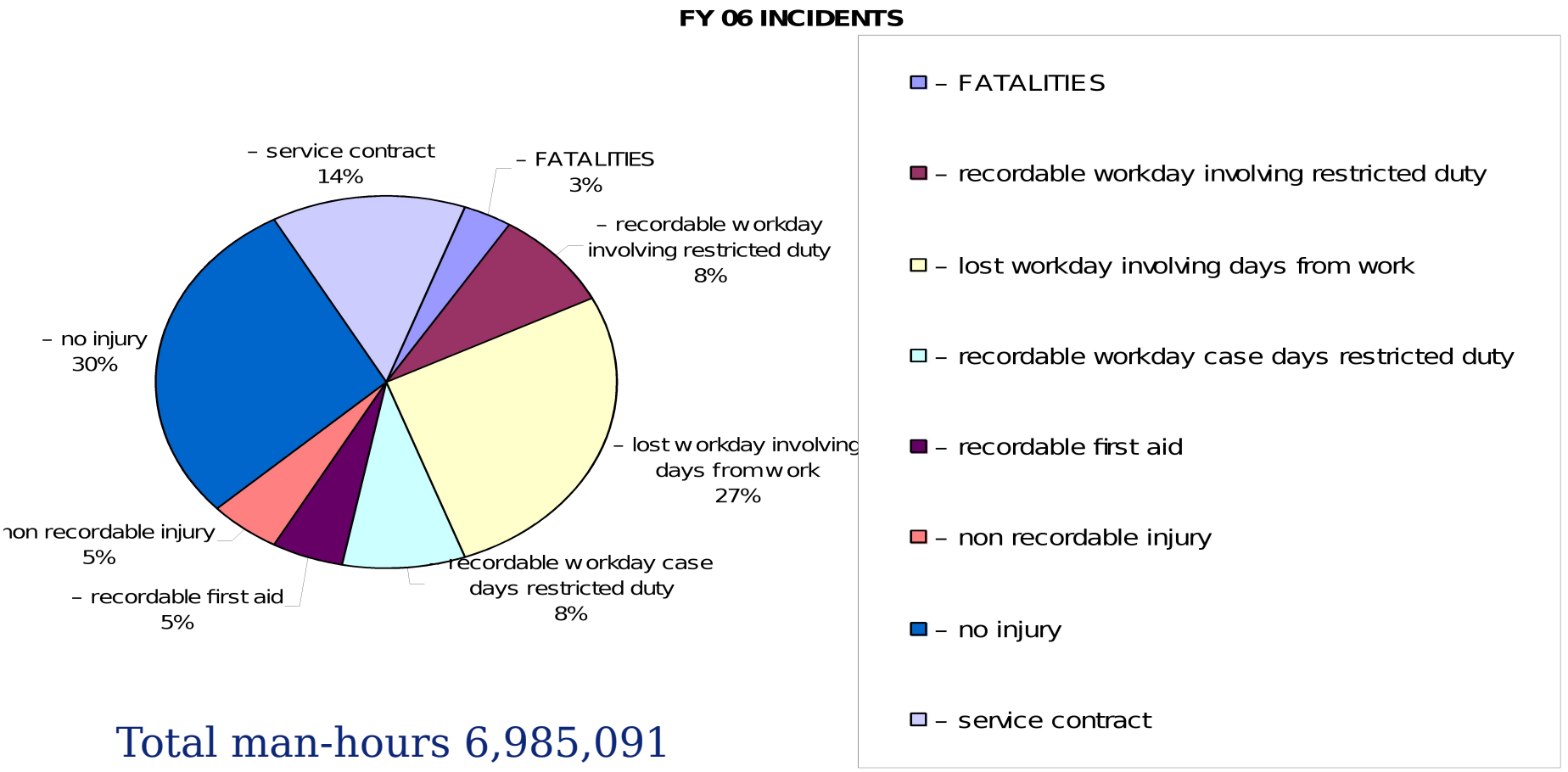


NAVFAC MIDLANT SAFETY
Lost Time Mishaps FY-05 & FY06


NAVFAC MIDLANT FY05 INCIDENTS
– service contract 3%
– no injury 21%
0%
– non recordable injury 9%
– FATALITIES
– recordable first aid 18%
– lost workday involving days from work 40%
– recordable workday case days restricted duty 9%
– FATALITIES
– lost workday involving days from work
– recordable workday case days restricted duty
– recordable first aid
– non recordable injury
– no injury
– service contract

Total man-hours 6,985,091
Total Fair Incidents (34)
Dart Rate (.49)

NAVFAC MIDLANT SAFETY
Lost Time Mishaps FY-05 & FY06


FY 06 INCIDENTS
– service contract 14%
– FATALITIES 3%
– recordable workday involving restricted duty 8%
– no injury 30%
– lost workday involving days from work 27%
non recordable injury 5%
– recordable first aid 5%
recordable workday case days restricted duty 8%
– FATALITIES
– recordable workday involving restricted duty
– lost workday involving days from work
– recordable workday case days restricted duty
– recordable first aid
– non recordable injury
– no injury
– service contract

Total man-hours 6,985,091
Total Fair Incidents (34)
Dart Rate (.49)

Lost Time Mishaps FY-07

TYPE OF INJURIES FOR FY 05, FY 06, FY07

caught between 8
caught under 2
contacted by 2
cut by 6
exerted 4
exposed to 7
fell, different level/same level/jumped 18
lifted, strained by 3
slipped 5
struck by/against 4
traveling in 1
tripped 3

NAVFAC
Naval Facilities Engineering Command

PROACTIVE ROLE OF THE SITE SAFETY HEALTH OFFICER AND DUTIES

PROACTIVE ROLE OF THE SITE SAFETY HEALTH OFFICER AND DUTIES

- ***Site Safety and Health Officer (SSHO) qualifications are based on the hazards of the project***
- ***The Contractor shall employ a competent person at each project to function as the Site Safety and Health Officer (SSHO), must be on duty at all times when work is being performed and responsible for enforcing accepted APP. * Can be dual hatted, depending on contract***
- ***The Prime Contractor is responsible for assuring subcontractor compliance with the safety and occupational health requirements contained in USACE Safety and Health Requirements Manual EM-385***
- ***Site Safety and Health Officer shall be provided at the work***

PROACTIVE ROLE OF THE SITE SAFETY HEALTH OFFICER AND DUTIES

- CONDUCT DAILY SAFETY AND HEALTH INSPECTIONS
- MAINTAIN A WRITTEN LOG WHICH INCLUDES:
  - AREA/OPERATION INSPECTED
  - DATE OF INSPECTION
  - IDENTIFIED HAZARDS
  - RECOMMENDED CORRECTIVE ACTIONS
  - ESTIMATED CORRECTIVE ACTIONS
  - ESTIMATED AND ACTUAL DATES OF CORRECTIO
  - SAFETY INSPECTION LOGS SHALL BE ATTACHED
  - THE CONTRACTORS' DAILY PRODUCTION OR QUALITY CONTROL REPORT

PROACTIVE ROLE OF THE SITE SAFETY HEALTH OFFICER AND DUTIES

- Conduct Mishap Investigations And Complete Required Reports
- Maintain The OSHA Form 300
- Maintain Daily Production Reports For Prime And Subcontractors
- Maintain Applicable Safety References Material On The Job Site
- Ensure Safety Meeting Are Conducted And Documented Minutes Showing Contract Title, Signatures Of Attendees And A List Of Topics Discussed Are Attached To Daily Or QC Reports

• Safety Meetings Are Required At Least Weekly, Conducted By Supervisors Or Foremen For All Workers

PROACTIVE ROLE OF THE SITE SAFETY HEALTH OFFICER AND DUTIES

- ATTEND THE PRE-CONSTRUCTION CONFERENCE
- ATTEND PRE-WORK MEETINGS INCLUDING:
  - PREPARATORY INSPECTION MEETING
  - PERIODIC IN-PROGRESS MEETINGS
- IMPLEMENT AND ENFORCE ACCEPTED:
  - ACCIDENT PREVENTION PLAN (APP)
  - ACTIVITY HAZARD ANALYSIS (AHA)

PROACTIVE ROLE OF THE SITE SAFETY HEALTH OFFICER AND DUTIES

- MAINTAIN A SAFETY AND HEALTH DEFICIENCY TRACKING SYSTEM THAT MONITORS DEFICIENCIE UNTIL RESOLUTION

- A LIST OF UNRESOLVED SAFETY AND HEALTH DEFICIENCIES SHALL BE POSTED ON THE SAFETY AND HEALTH BULLETIN BOARD

- ENSURE SUB – CONTRACTOR COMPLIANCE WITH SAFETY AND HEALTH REQUIREMENTS

PROACTIVE ROLE OF THE SITE SAFETY HEALTH OFFICER AND DUTIES

FAILURE TO PERFORM THE ABOVE DUTIES WILL RESULT IN DISMISSAL OF THE SUPERINTENDENT AND OR SSHO, AND A WORK STOPPAGE

THE WORK STOPPAGE WILL REMAIN IN EFFECT PENDING APPROVAL OF A SUITABLE REPLACEMENT

SITE SAFETY HEALTH OFFICER (SSHO)

Six levels of personnel qualifications

Level 1 * small non – hazardous service or maintenance projects

Level 2 * minor construction, service and maintenance < $200,000

Level 3 * small to mid-size construction projects <$2 million

Level 4* construction projects normally < $15 million

Level 5* medium to large construction projects could be any project

Level 6* large, complex and high hazard construction and service projects that require significant safety leadership

SITE SAFETY HEALTH OFFICER (SSHO)

Qualifications increase for each level

Level 1* *Worked on similar projects, 10-hour OSHA safety class*

Level 2* Minimum of 3 years safety work on similar projects, 30-hour OSHA safety class

Level 3* Minimum of 5 years safety work on similar projects, 30 –hour OSHA safety class

Level 4* Minimum of 10 years safety work of a progressive nature with at least 5 years of experience on similar projects

Level 5* Associate Safety Professional (ASP), Certified Safety Trained Supervisor (STS) and/or Construction Health & Safety Technician (CHST) Minimum of 10 years safety work of a progressive nature with at least 5 years of experience on similar projects

Level 6* Certified Safety Professional (CSP) and/or Certified Industrial Hygienist (CIH) Minimum of 10 years safety work of a progressive nature with at least 5 years of

RECENT INCIDENTS/LESSONS LEARNED

SAFETY STAND-DOWN

- **Accident Type: OVERTURNED JLG/AERIAL LIFT**
- **Injury: FATALITY**
- **Damage: JLG OVERTURNED/ DAMAGED**
- **Type of Work: PAINTING OUTSIDE 68 FOOT BUILDING**
- **Equipment: JLG MODEL 80HX+6**
- **<u>DESCRIPTION OF THE ACCIDENT</u>: Employee painting outside of building us an 80 foot JLG/Aerial Lift. Equipment overturned. Worker was wearing proper PPE, however he fell or was ejected out of the basket striking a steel storage box and landing under the basket of the JLG.**

- **<u>IN-HOUSE WORKFORCE:</u>**
- **Suspend any operations of JLG 80HX/80HX+6 models pending results of mishap investigation.**
- **Hold a man lift safety review with all operators and personnel. (Attachment 1 & 2 provided as a training tool)**
- **Ensure all workers have current "Competent Person" training for the type of man lifts that they are operating.**
- **Ensure all operators perform daily walk around checks on the equipment in accordance with the manufacturer's operation manual and document using Operational Daily Check List.**
-
- **<u>MIDLANT CONTRACTORS:</u>**
- **Suspend any operations of JLG 80HX/80HX+6 models pending results of mishap investigation.**
- **Competent person must re-inspect every piece of mobile equipment on site in accordance with USACOE EM 385-1-1 16.A.01 and document using the ACOE form "Safety Inspection Checklist for Mobile Construction Equipment" (Attachment 3).**
- **Hold a man lift safety review with all operators and personnel.**
- **Ensure all operators of Aerial Lifts have current "Competent Person" training for the type of man lifts that they are operating.**
- **Ensure all operators perform daily walk around checks on the equipment in accordance with the manufacturer's operation manual and US ACOE EM385-1-1 16.A.02.**

RECENT INCIDENTS/LESSONS LEARNED

- **Accident Type: CAUGHT BETWEEN**
- **Injury: FATALITY**
- **Damage: CONVEYOR SYSTEM DAMAGED**
- **Type of Work: CRUSHING PILES OF CONCRETE**
- **Equipment: PORTABLE CONVEYOR SYSTEM**
- **<u>DESCRIPTION OF THE ACCIDENT</u>:**
- **Employee climbed between an upper and lower conveyor belt and attempted to clear an obstruction of rebar caught between two belts. Another employee pushed on the upper belt with a skid loader to help clear the ball of rebar apparently causing the upper conveyor to slide off the supports and fall, crushing fellow employee between conveyor belts resulting in the death of one employee.**
- **<u>DIRECT CAUSE:</u> No standard operating procedures for use or maintenance of equipment.**
- **<u>INDIRECT CAUSE:</u> Safety Plan which did not the requirement of EM-385 –1-1**
- **No Safety Section 01525**
- **No preparatory meeting for this activity.**
- **No AHA for the work.**
- **Failure of superintendent to ensure EM-385 safety requirements was met.**
- **Failure of superintendent to be on site during hours of operation.**
- **Failure of superintendent to ensure new personnel had received safety indoctrination and familiar with hazards associated with the work.**
- **<u>ROOT CAUSE:</u>**
- **Ineffective control of subcontractor site safety and implementation of EM-385-1-1 safety procedures on site.**
- **Prime contractor took no responsibility for sub contractor actions and considered the subcontractor to be a separate operation from his activities.**
- **<u>LESSONS LEARNED:</u>**
- **PWD Service CSR safety training should equal safety training of construction ETs.**
- **The site superintendent and QC manager must attend pre-construction and pre-performance meetings. The meeting shall be rescheduled if they fail to attend.**
- **A process for documenting actions taken in the field to ensure safe working conditions needs to be developed for service contracts. Similar to daily reports used by construction & required by P-445.**
- **Include FAR 52.236-13 and NFGS 01525 in all MIDLANT service contracts.**

RECENT INCIDENTS/LESSONS LEARNED

Operator catches on fire after filling up weedeater

- Operator put weed eater over his shoulder and spilled gas on his shirt. Operator was told to rinse clothing and not to smoke. Operator unintentionally sparked his lighter while removing lighter from his pants and catches on fire.

Causes:

- Operator did not ensure cap was replaced after fueling operations
- Operator did not immediately remove fuel soaked clothing after contamination

Lessons Learned:

- Operators need to follow EM 385 Section 09.B.05 which says in part "workers…..shall not be allowed to continue work if their clothing becomes contaminated, and they must remove or wet down the clothing as soon as possible.
- Contractor needs to write an SOP on refueling trimmers and mowers

Contractor Safety Acquisition Regulations

FAR and EM385-1-

CONSTRUCTION/SERVICE SAFETY PROGRAM

- **FEDERAL ACQUISITION REGULATION**
- **PART 36 CONSTRUCTION AND ARCHITECT-ENGINEER CONTRACTS**
- **SECTION 36.513 Accident prevention.**
- (a) The Contracting Officer shall insert the clause 52.246-13, Accident Prevention, in solicitations and contracts when a fixed-price construction contract or a fixed-price dismantling, demolition, or removal of improvements contract is contemplated and the contract amount is expected to exceed the simplified acquisition threshold. The contracting officer may insert the clause in solicitations and contracts when a fixed-price construction or a fixed-price contract for dismantling, demolition, or removal of improvements is contemplated and the contract amount is expected to be at or below the simplified acquisition threshold.

CONSTRUCTION/SERVICE SAFETY PROGRAM

- **FAR 52.236-13 Accident Prevention. (Nov 1991)**
- **(a) The Contractor shall provide and maintain work environments and procedures which will—**
  - **(1) Safeguard the public and Government personnel, property, materials, supplies, and equipment exposed to Contractor operations and activities;**
  - **(2) Avoid interruptions of Government operations and delays in project completion dates; and**
  - **(3) Control costs in the performance of this contract.**
- **(b) For these purposes on contracts for construction or dismantling, demolition, or removal of improvements, the Contractor shall—**
  - **(1) Provide appropriate safety barricades, signs, and signal lights;**
  - **(2) Comply with the standards issued by the Secretary of Labor at 29 CFR Part 1926 and 29 CFR Part 1910; and**
  - **(3) Ensure that any additional measures the Contracting Officer determines to be reasonably necessary for the purposes are taken.**

CONSTRUCTION/SERVICE SAFETY PROGRAM

- **FAR 52.236-13 Accident Prevention. (Nov 1991)**
- ***(c)*** *If this contract is for construction or dismantling, demolition or removal of improvements with any Department of Defense agency or component, the Contractor shall comply with all pertinent provisions of the latest version of the U.S. Army Corps of Engineers Safety and Health Requirements Manual, EM 385-1-1, in effect on the date of the solicitation.*

- **(d) Whenever the Contracting Officer becomes aware of any noncompliance with these requirements or any condition which poses a serious or imminent danger to the health or safety of the public or Government personnel, the Contracting Officer shall notify the Contractor orally, with written confirmation, and request immediate initiation of corrective action. This notice, when delivered to the Contractor or the Contractor's representative at the work site, shall be deemed sufficient notice of the noncompliance and that corrective action is required. After receiving the notice, the Contractor shall immediately take corrective action. If the Contractor fails or refuses to promptly take corrective action, the Contracting Officer may issue an order stopping all or part of the work until satisfactory corrective action has been taken. The Contractor shall not be entitled to any equitable adjustment of the contract price or extension of the performance schedule on any stop work order issued under this clause.**

- **(e) The Contractor shall insert this clause, including this paragraph (e), with appropriate changes in the designation of the parties, in subcontracts.**
-

CONSTRUCTION/SERVICE SAFETY PROGRAM

SAFETY AND HEALTH REQUIREMENTS FOR ALL CONTRACTS

EM-385-1-1 SAFETY and HEALTH REQUIREMENTS MANUAL

- APPLICABILITY APPLIES TO ALL UNITED STATES ARMY CORPS OF ENGINEERS CONTRACTS (USACE) AND NAVAL FACILITIES ENGINEERING COMMAND (NAVFAC) CONTRACTS

EM-385-1-1 REFERENCES

- 29 CFR 1926 SAFETY and HEALTH REGULATIONS for CONSTRUCTION
- 29 CFR 1910 GENERAL INDUSTRIAL
- 29 CFR 1960 BASIC PROGRAM ELEMENTS for Federal Employees OSHA
- FEDERAL ACQUISTION REGULATION (FAR) CLAUSE 52.236-13
- UNIFIED FACILITIES GUIDE SPECIFICATION (UFGS) 013529 "SAFETY AND OCCUPATIONAL HEALTH REQUIREMENTS"

❖ ***THE MOST STRINGENT STANDARDS SHALL APPLY***

CONSTRUCTION/SERVICE SAFETY PROGRAM

- **CONSTRUCTION WORK SHALL COMPLY WITH THE LATEST VERSION OF EM-385-1-1 (including interim changes) THAT IS IN EFFECT ON THE DATE OF SOLICITATION.**
- **PRIOR TO MAKING AN OFFER, BIDDERS SHOULD CHECK THE HQUSACE SAFETY and OCCUPATIONAL HEALTH WEB SITE**

  http: //www.hq.usace.army.mil/soh/hqusace_soh.htm
- **NO SEPARATE PAYMENT WILL BE MADE FOR COMPLIANCE WITH THIS PARAGRAPH OR FOR COMPLIANCE WITH OTHER SAFETY and HEALTH REQUIREMENTS OF THIS CONTRACT**

Changes to 03 Nov 2003 Edition of EM 385-1-1

Changes to 03 Nov 2003 Edition of EM 385-1-1

The changes contained on this page are contractually binding as of the effective date shown on this page at the date of solicitation (Reference paragraph 4.b. (1) introductory letter EM 385-1-1).

Change #	Effective Date	Reference	Nature of Change	Change (English)	Change (Japanese)
0001	6 Jun 04	INDEX (corrected)	Corrections / Additions	Index	
0002	30 Jun 05	16.A.36 and 16N	Addition	Excavators	PDF
0003	30 Jun 05	Appendix T	Addition	Appendix T	PDF
0004	06 Mar 07	19 .A.07.h.(1), (2) & (3)	Deletion		
0005	06 Mar 07	19 .B.01.c	Deletion		
0006	06 Mar 07	19.G, 19.H, 19.I	Addition	Handrails	PDF
0007	06 Mar 07	Appendix U	Addition	Appendix U	PDF
0008	30 Apr 07	05.A.11; 08.B.08; App. B.9.d; B.10.b(4)	Modifications	HiViz PPE	PDF
0009	PENDING	05.A.01.a	Modification	PENDING	
0010	1 Jul 07	05.H; Figure 5-1; 19.A.03.d	Modification	Inflatable PFDs	05.H/19.A.03 Figure 5-1
0011	10 Oct 07	19.A.07.l	Addition	"Duck" Pond Protection	
0012	10 Oct 07	22.M	Addition	Hanging Scaffolds	

CONSTRUCTION/SERVICE SAFETY PROGRAM

ACCIDENT PREVENTION PLAN (APP)

- **BEFORE INITIATION OF WORK AT THE JOB SITE, AN APP WITH APPROPRIATE APPENDICES WRITTEN IN ENGLISH BY THE PRIME CONTRACTOR FOR THE SPECIFIC WORK AND HAZARDS OF THE CONTRACT AND IMPLEMENTING IN DETAIL THE PERTINENT REQUIREMENTS OF EM-385 WILL BE REVIEWED AND FOUND ACCEPTABLE BY THE GOVERNMENT DESIGNATED AUTHORITY (GDA)**

- **APPS SHALL BE DEVELOPED AND SUBMITTED BY THE CONTRACTOR IN THE FORMATS PROVIDED IN APPENDIX A of EM-385-1-1.**

- **THE CONTRACTOR SHALL ADDRESS EACH OF THE ELEMENTS/SUBELEMENTS IN THE OUTLINE CONTAINED IN APPENDIX A IN THE ORDER THAT THEY ARE PROVIDED IN THE MANUAL.**

- **IF BY THE NATURE OF THE WORK AN ITEM IS NOT APPLICABLE, THE CONTRACTOR WILL SO STATE AND PROVIDE A JUSTIFICATION FOR WHY THAT ELEMENT/SUBELEMENT IS NOT APPLICABLE**

CONSTRUCTION/SERVICE SAFETY PROGRAM

- **MINIMUM BASIC OUTLINE FOR ACCIDENT PREVENTION PLAN**
  - **1) SIGNATURE SHEET (a) (b) (c)**
  - **2) BACKGROUND INFORMATION (a) (b) (c) (d) (e) (f)**
  - **3) STATEMENT OF SAFETY AND HEALTH POLICY**
  - **4) RESPONSIBILITY AND LINES OF AUTHORITIES (a) (b)**
  - **5) SUBCONTRACTORS AND SUPPLIERS (a) (b) (c)**
  - **6) TRAINING (a) (b) (c) (d)**
  - **7) SAFETY AND HEALTH INSPECTIONS (a) (b)**
  - **8) SAFETY AND HEALTH EXPECTATIONS, INCENTIVE PROGRAMS, AND COMPLIANCE (a) (b) (c) (d)**
  - **9) ACCIDENT REPORTING (a) (b) (c)**
  - **10) MEDICAL SUPPORT**
  - **11) PERSONAL PROTECTIVE EQUIPMENT**
  - **12) PLANS (PROGRAMS, PROCEDURES) REQUIRED BY THE SAFETY MANUAL (as applicable) (a) through (bb)**
  - **13) CONTRACTOR INFORMATION**
  - **14) SITE SPECIFIC HAZARDS AND CONTROLS**

CONSTRUCTION/SERVICE SAFETY PROGRAM ACTIVITY HAZARD ANALYSIS (AHA)

- **BEFORE BEGINNING EACH WORK ACTIVITY INVOLVING A TYPE OF WORK PRESENTING HAZARDS NOT EXPERIENCED IN PREVIOUS PROJECT OPERATIONS OR WHERE A NEW WORK CREW OR SUB-CONTRACTOR IS TO PERFORM THE WORK, THE CONTRACTOR(S) PERFORMING THAT WORK ACTIVITY SHALL PREPARE AN AHA.**

- **AHAs WILL DEFINE THE ACTIVITIES BEING PERFORMED AND IDENTIFY THE SEQUENCE OF WORK, THE SPECIFIC HAZARDS ANTICIPATED, SITE CONDITIONS, EQUIPMENT, MATERIALS, AND THE CONTROL MEASURES TO BE IMPLEMENTED TO ELIMINATE OR REDUCE EACH HAZARD TO AN ACCEPTABLE LEVEL OF RISK.**

- **THE NAMES OF THE COMPETENT/QUALIFIED PERSON(S) REQUIRED FOR A PARTICULAR ACTIVITY (i.e. excavations, scaffolding, fall protection, other activities as specified by OSHA and EM-385-1-1) WILL BE IDENTIFIED AND INCLUDED IN THE AHA.**

- **PROOF OF THEIR COMPETENCY/QUALIFICATION MUST BE SUBMITTED TO THE GDA FOR ACCEPTANCE PRIOR TO THE START OF THAT WORK ACTIVITY.**

- **A QUALIFIED PERSON(S) SHALL CONDUCT ALL TRAINING REQUIRED BY THIS MANUAL**

Development, Validation, Implementation and Enhancement of a Voluntary Protection Program Center of Excellence (VPP CX) Capability for Department of Defense

VPP 101

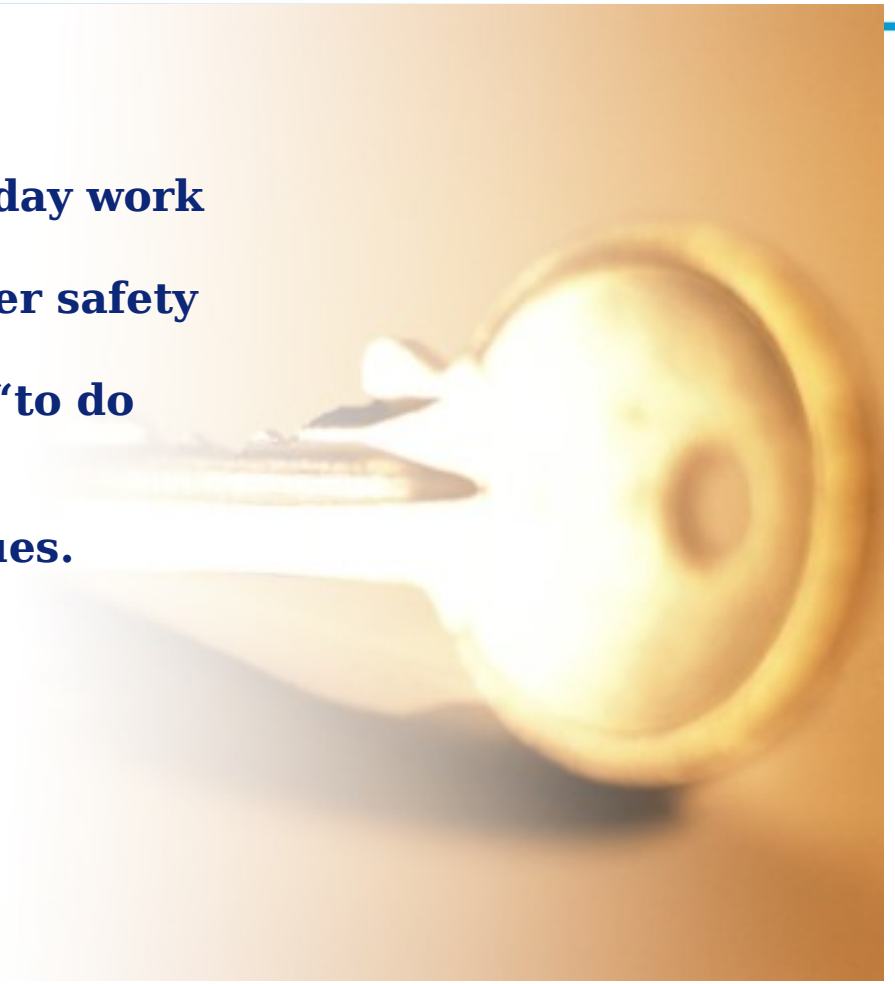
VPP Process

- VPP is a process, a culture, not an inspection.
- There are 4 main parts to this process:

  - Management Leadership and Employee Involvement
  - Work Site Analysis
  - Hazard Prevention and Control
  - Safety and Health Training

Keys to Success in VPP Program

- Culture is the key.
- Promote safety as a core value in everyday work as compared to a priority.
- Create a supportive atmosphere to foster safety as a core value.
- Establish framework as compared to a “to do list”.
- Determine organizational values which empowers the culture and the core values.



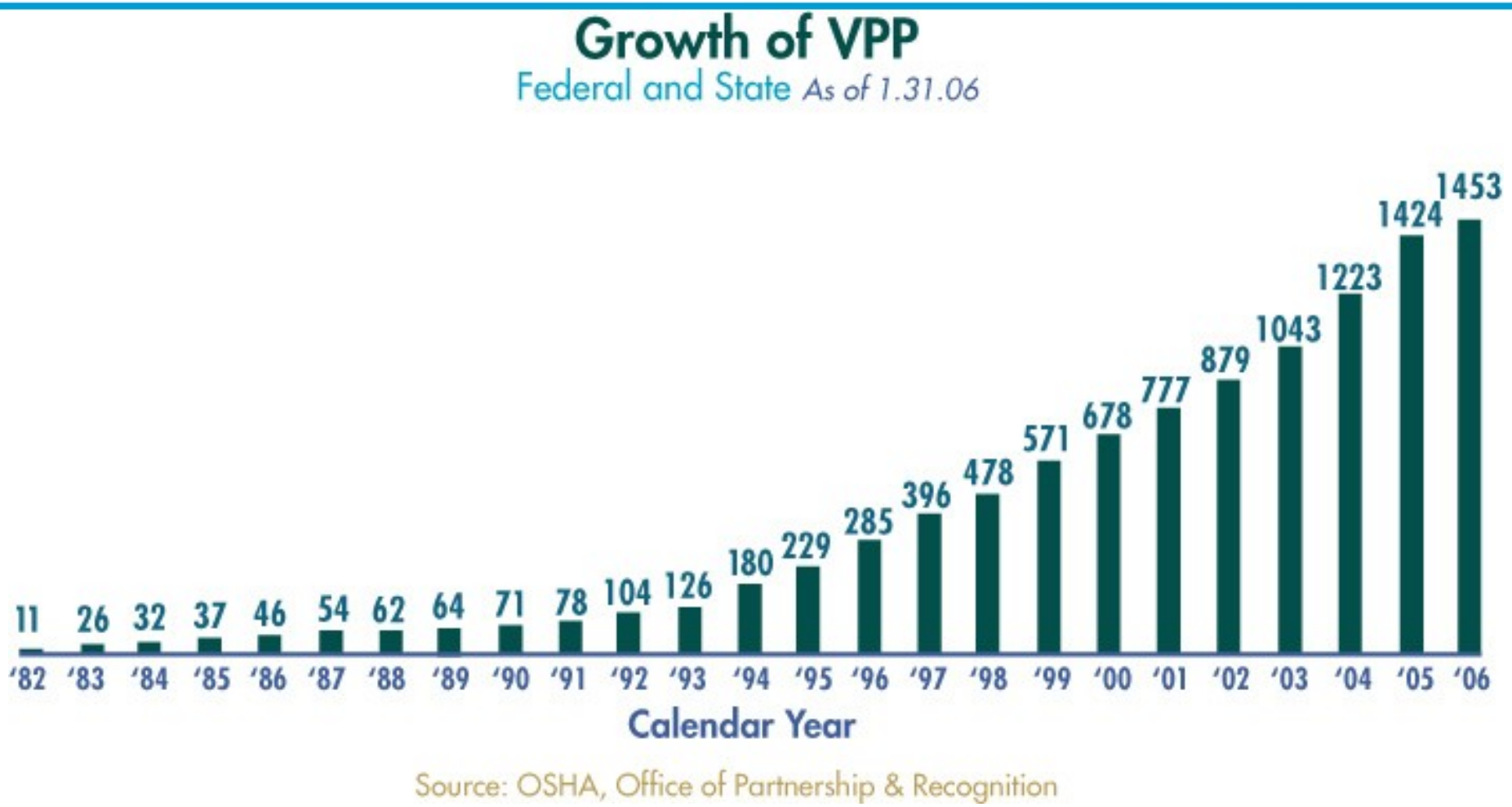
VPP Benefits

- **The average VPP worksite has a Days Away Restricted or Transferred (DART) case rate of 52% below the average for its industry.**
- **Fewer injuries and illnesses mean greater profits as workers' compensation premiums and other costs plummet.**

  -Lower worker's compensation costs (20+%/yr)

  -Positive Return on Investment (150+%)

VPP Statistics



Management Leadership

- Clearly established policies that have been communicated to & understood by all employees
- Established goals and objectives for meeting the goals.

Management Leadership

- Managers must provide visible leadership by:
  - Establishing clear lines of communication
  - Creating an environment that allows for reasonable employee access to top site management
  - Setting example of safe and healthful behavior
  - Ensuring all workers, including contractors are provided equally high quality safety and health protection
  - Clearly defining responsibilities in writing.

Accident/Incident Investigations

- **The accident/incident investigation must result in:**
  - Assigned priorities for hazard elimination or control
  - A written report of findings that is available to employees
  - No undo assignment of employee blame or reprisal.